

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSE ANN PAGUIRIGAN, individually and
on behalf of all others similarly situated,

: 1:17 Civ. 1302 (NG) (JO)

Plaintiff, :

-vs-

: **NOTICE OF JOINT MOTION
TO VACATE**

PROMPT NURSING EMPLOYMENT AGENCY :
LLC d/b/a SENTOSA SERVICES,
SENTOSACARE LLC, SENTOSA NURSING :
RECRUITMENT AGENCY, BENJAMIN LANDA,
BENT PHILIPSON, BERISH RUBENSTEIN a/k/a :
BARRY RUBENSTEIN, FRANCIS LUYUN,
GOLDEN GATE REHABILITATION & HEALTH :
CARE CENTER LLC, and SPRING CREEK
REHABILITATION AND NURSING CENTER, :

Defendants. :

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PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Plaintiff Rose Ann Pagurigan (“Paguirigan”) and Defendants Prompt Nursing Employment Agency LLC d/b/a/ Sentosa Services, SentosaCare LLC, Sentosa Nursing Recruitment Agency, Benjamin Landa, Bent Philipson, Berish Rubenstein a/k/a Barry Rubenstein, Francris Luyun, Golden Gate Rehabilitation & Health Care Center LLC, and Spring Creek Rehabilitation and Nursing Center shall move this Court, before the Honorable Nina Gershon, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order vacating (a) only that portion of the September 27, 2019 Partial Judgment [ECF No. 96] that relates to and found any violation of the Trafficking Victims Protection Act (“TVPA”) and the findings related to piercing the corporate veil against defendant Rubenstein; and (b) only that portion of the June 1, 2021 Damages Order [ECF No.

140] that found Defendants liable for compensatory damages and federal statutory interest for violations of the TVPA.

Dated: October 5, 2021

THE HOWLEY LAW FIRM P.C

/s/ John J.P. Howley

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